

**U.S. Department of Education**

**Staff Report  
to the  
Senior Department Official  
on  
Recognition Compliance Issues**

<b>RECOMMENDATION PAGE</b>
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1. **Agency:** Oklahoma Board of Career & Technology Education (1976/2007)  
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Petition for Continued Recognition
3. **Scope of Recognition:** State agency for the approval of public postsecondary vocational education.
4. **Date of Advisory Committee Meeting:** December, 2011
5. **Staff Recommendation:** Continue the Oklahoma State Board of Career and Technology Education's (OBCTE) current recognition and require the agency to come into compliance within 12 months, and submit a compliance report that demonstrates the agency's compliance with the issues identified below. Deny the agency's request for an expansion of scope to include distance education until the agency can demonstrate that it has consistently evaluated and accredited programs via distance education in compliance with the criteria for recognition.
6. **Issues or Problems:** The agency must provide information describing how it reviews and approves career majors that include a distance education component. It must also provide additional information specifically regarding the standards and process for accrediting institutions that include offerings via distance education, illustrating its evaluation of institutions and their programs (against the agency standards and their quality indicators) that offer distance education. (603.24(a)(1)(iii))

The agency must correct its site evaluator training manual to remove

references to business and industry representatives serving on site evaluation teams. The agency must provide information on the selection process, to include selection criteria and qualifications of the members of its site evaluator pool, and specifically address how the agency ensures expertise on distance education delivery is included on site teams, as appropriate. (603.24(a)(2)(iii)(A))

The agency needs to include information on reinstatement of accreditation status in its handbook. (603.24(a)(3)(i))

The agency must demonstrate how the industry or national accrediting agency standards it accepts crosswalk with the state requirements and how they are applied/verified in the course of the on-site review. It must also demonstrate that it includes an assessment of distance education in its self-studies, on-site review process, and training. (603.24(a)(3)(ii))

The agency must provide additional information and evidence of how an institution self-assesses its distance education offerings against agency standards and indicators, as appropriate. (603.24(a)(3)(ii)(A))

The agency needs to provide information on the content of the orientation sessions. It must provide further information and justification that the use of "crucial" suggestions in the review process is clearly identified and the agency application and decision-making in this context are applied consistently. (603.24(a)(3)(ii)(B))

The agency needs to document student participation on its advisory council. The agency also needs to provide documentation to demonstrate the advisory council's assigned functions. (603.24(b)(1)(i))

The agency must provide information regarding its standards review process. (603.24(b)(1)(vii))

The agency must provide documentation of how it monitors changes that may occur during an institution's accreditation period. (603.24(b)(1)(xi))

The agency must address how its standards (as opposed to its evaluation instrument) require ethical institutional practices related to fair and equitable student tuition refunds (i.e., financial aid practices). (603.24(d)(1))

## **EXECUTIVE SUMMARY**

### **PART I: GENERAL INFORMATION ABOUT THE AGENCY**

The Oklahoma Board of Career and Technology Education (OBCTE) is recognized for the approval of public postsecondary vocational education programs offered at institutions in the State of Oklahoma that are not under the jurisdiction of the Oklahoma State Regents for Higher Education. The OBCTE is vested with the power to govern and establish criteria and procedures for 29 technology center districts encompassing 57 campuses across the state. Approval (accreditation) by the OBCTE enables the technology centers to receive funding under Title IV, as well as under other federal programs related to vocational education.

#### **Recognition History**

The OBCTE was first recognized in 1976 and has held continued recognition since its initial recognition. The agency was last reviewed at the December 2006 meeting of the NACIQI, which at that time recommended the maximum four-year period of recognition allowable for state approval agencies. The Secretary concurred with the Committee's recommendation and signed the agency's decision letter in April 2007.

On August 14, 2008, the Higher Education Opportunity Act amended the Higher Education Act of 1965, which disbanded the existing NACIQI. This meeting is the first opportunity for the agency to appear before NACIQI for a review based on the revisions to the criteria for recognition.

In this petition, the agency is requesting an expansion of its recognition to include its approval (accreditation) of public, postsecondary vocational education institutions offering non-degree vocational education including those programs offered via distance education.

## **PART II: SUMMARY OF FINDINGS**

### **§603.24 Criteria for State agencies**

**The following are the criteria which the Secretary of Education will utilize in designating a State agency as a reliable authority to assess the quality of public postsecondary vocational education in its respective State.**

**(iii) Delineates the process by which it differentiates among and approves programs of varying levels.**

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The OBCTE has responsibility for all non-degree public vocational training across the state. Vocational education in OK is organized by clusters into career pathways and career majors and placed in an instructional framework. The instructional framework represents the minimum hours of instruction for career majors identified at the state level. The career majors vary in length depending upon degree of difficulty; all culminate in a certificate. All public vocational technical education institutions (secondary and postsecondary) select their program offerings from this framework and seek/receive state approval for their selections to include revisions/modifications to program offerings as appropriate. The agency has outlined its process for granting approval of courses and majors and provided documentation of such requests.

In addition, the OBETC has a voluntary accreditation process for public postsecondary non-degree granting career and technology education institutions that seek to participate in the federal student financial aid program. Only career majors of at least 600 clock hours are approved for offering by public postsecondary non-degree granting institutions. Upon approval of the request to seek accreditation (and title iv eligibility), the institution must undertake a self-assessment process of how it meets the agency's 11 program standards and undergo an on-site evaluation. The agency provided sample self study template and evaluation questionnaires as documentation.

However, the agency is seeking to expand its recognition to include its approval of courses and majors offered in whole or in part via distance education; it provided no information describing how the distance education program was reviewed and approved. And while it provided pieces of the on-site evaluation report for a distance education program, it is not comprehensive in describing how the program was assessed against the quality indicators of its eleven (11) standards.

Also, the Department has distinct definitions for distance education vs. correspondence education. The agency needs to determine if the programs and courses it evaluates comply with the definition of distance education or correspondence education or both. If the agency seeks to include correspondence education in its scope, it must provide the same type of

information regarding its review of correspondence programs

Also, the agency states that “the State Board accepts, wholly or in part, the national program certification and/or accreditation in lieu of the on-site program evaluation provided the association's standards are equal to or more comprehensive than the standards established by the State Board. This does not comply with the accreditation process expected of a recognized agency and is discussed later in this analysis.

Staff determination: The agency does not meet the requirements of this section. The OBCTE must provide more information describing how it reviews and approves career majors that include a distance education component. It must also provide additional information specifically regarding the standards and process for accrediting institutions that include offerings via distance education illustrating its evaluation of institutions and their programs (against the agency standards and their quality indicators) that offer distance education. If the agency seeks to include correspondence education in its scope, it must provide the same type of information regarding its review of correspondence programs.

#### **Analyst Remarks to Response:**

In its response to the draft staff analysis, the agency stated that it does not plan to modify its standards to reflect any requirements specific to distance education and that it will instead include "a few additional questions" for distance education instructors as a means of evaluating distance education programs. This is not a sufficient basis for the approval and review of distance education programs. The agency must address distance education requirements in its standards and quality indicators and in turn base its qualitative approval/review process (and review instruments) specific to distance education upon the requirements for assessing the quality of the distance education programs as set forth in its standards.

The agency provided additional documentation in its response, but it was related to (and apparently developed by) the distance education program at one institution. It is not clear that the agency has developed and adopted distance education requirements for use at a statewide level. ED staff's observation of an agency on-site review only served to reinforce this conclusion.

Staff determination: The agency does not meet the requirements of this section. The agency must provide information describing how it reviews and approves career majors that include a distance education component. It must also provide additional information specifically regarding the standards and process for accrediting institutions that include offerings via distance education, illustrating its evaluation of institutions and their programs (against the agency standards and their quality indicators) that offer distance education.

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**(A) to participate on visiting teams,**

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The agency's on-site evaluator training manual states that the evaluation team consists of:

- agency program specialists and coordinators
- teachers with expertise in the program areas
- technology center administrators and staff
- business and industry representatives

A sample on-site evaluation agenda showed a team with 18 members, including eight staff members from the state agency and ten state technology center staff members, including only one instructor. No business or industry representatives were listed as team members. No information was provided as to whether this sample is typical of team size and composition.

The narrative states that the agency's accreditation coordinator also attends each on-site visit and that other state agency staff team members are chosen by virtue of their current and prior experience. Instructors are recommended by state program administrators and program specialists (apparently this refers to state agency staff, rather than technology center staff). They are chosen based upon knowledge and experience in a particular trade, subject matter, or administrative area (in the narrative, the use of the term "instructor" appears to encompass members in the category of technology center administrators and staff, who are later grouped under the term "educators" in the narrative). No information was provided on how business and industry representatives are chosen.

The narrative states that all evaluators are practicing/certificated educators as specified under state law. First year teachers and administrators may also participate on review teams as observers. No information was provided regarding how many people are currently in the agency's pool of on-site evaluators.

The narrative states that "state staff members have served on and/or chaired numerous evaluation teams" but it is not clear if state agency staff always chair the teams or how team chairs are chosen.

The narrative states that team members are provided with a copy of the evaluators' training manual prior to the review, and training is conducted at the start of the on-site visit. The sample manual that was provided includes information on the evaluators' role in the evaluation process, how to use the evaluation instrument correctly, evaluation practice exercises, the standards, a sample agenda, characteristics of good evaluators, and a sample evaluation report.

A sample signed conflict of interest form for evaluation team members who are not state employees was provided. The agency also provided a copy of the state government ethics commission rules governing ethics and conflicts of interest on the part of state employees, which would cover the state agency staff members

who are participating as team members.

The narrative states that the agency complies with federal and state anti-discrimination laws, although no documentation regarding the state laws were provided.

Staff determination: The agency does not meet the requirements of this section. The agency must provide additional information regarding requirements as to the size and composition of its on-site review teams, including the choice of business and industry representatives. The agency must provide information on the number/qualifications of members of its site evaluator pool and specifically address how the agency ensures expertise on distance education delivery is included on site teams, as appropriate. The agency must provide additional information regarding how team chairs are chosen. The agency must provide documentation regarding its non-discrimination laws.

### **Analyst Remarks to Response:**

#### **Size and Composition of Teams:**

The agency notes in its response that the typical site team consists of approximately 17 members, which aligns with the sample documents provided showing a team of 18 members. Teams include state agency and technology center staff. The agency states in its response that it no longer includes business and industry representatives on its site teams due to the potential for conflicts of interest. This conflicts with the information in the agency's site evaluator training manual, which states that the team will include business and industry representatives.

#### **Site Evaluator Pool:**

The agency uses educators from other technology centers on its site teams. The agency has not described and documented the process it uses to select educators nor the selection criteria and qualifications required of educators selected to participate on site visit teams.

#### **Distance Education:**

The agency reports that its technology centers are offering programs via distance education. The inclusion of competent and knowledgeable persons, qualified by experience and training in distance education, on the site evaluation teams for reviews at institutions offering distance education is essential. The agency has not described and documented the process it uses to select persons with expertise in distance education, the selection criteria it uses to select them and the qualifications required to be selected.

#### **Team Chairs:**

Both the overall team and individual program teams are chaired by state agency staff, who are chosen based upon their area of expertise.

#### **Non-discrimination:**

The agency provided a copy of its rules, which include specific requirements

related to non-discrimination.

Staff determination: The agency does not meet the requirements of this section. The agency must correct its site evaluator training manual to remove references to business and industry representatives serving on site evaluation teams. The agency must provide information on the selection process, to include selection criteria and qualifications of the members of its site evaluator pool, and specifically address how the agency ensures expertise on distance education delivery is included on site teams, as appropriate.

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**(i) Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying, and reinstating approval status:**

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The agency's accreditation handbook, under Section G, Categories of Accreditation Status, defines four categories of approval status: candidacy status; full accreditation; probational accreditation; and accreditation dropped.

Procedures for granting, reaffirming, revoking, and denying accreditation are included in the definitions. However, reinstatement of accreditation does not appear to be addressed in this section. More information is needed on how the agency handles reinstatement of accreditation status.

Staff determination: The agency does not meet the requirements of this section. The agency needs to provide more information on how it handles reinstatement of accreditation status.

**Analyst Remarks to Response:**

The agency states in its response that no technology center has ever been placed on probational accreditation or had its accreditation status dropped. Nevertheless, the agency includes the possibility of dropped accreditation in the categories of approval status listed in its handbook. Therefore, procedures for reinstatement of accreditation should be included in its handbook, as well.

Staff determination: The agency does not meet the requirements of this section. The agency needs to include information on reinstatement of accreditation status in its handbook.

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**(ii) Requires, as an integral part of the approval and re-approval process, institutional or program self-analysis and on-site reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.**

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The agency's accreditation handbook, under Evaluation and Review Procedures, specifies that, as part of the comprehensive evaluation process, each technology center will be required to submit a self-study and undergo an on-site review. The handbook describes the nature of the self-evaluations and specifies that both programmatic areas and administrative/support services will undergo these reviews.

The agency narrative states that, "The self-study in the programmatic areas for which there is no national program accreditation or certification consists of each teacher or team of teachers completing a summary evaluation questionnaire. It is not clear what this distinction means. More clarification of this is necessary.

In an earlier section of the petition narrative, that agency also reported that "the State Board accepts, wholly or in part, the national program certification and/or accreditation in lieu of the on-site program evaluation provided the association's standards are equal to or more comprehensive than the standards established by the State Board." It is not commonly accepted practice in recognized accreditation that the decision making entity accept the standards and evaluation of another entity in lieu of its own. More information on this practice is required.

The agency provides questionnaires that outline the quality indicators for each of its standards for the centers to use in conducting their self-studies and for evaluation teams to use in conducting their on-site reviews. However, while the agency is seeking an expansion of its state approval to include distance education, there is no evidence of the review of the distance education component in the self study assessment nor evidence of the use of the questionnaire during the on-site review evaluation. The agency must provide additional information and evidence of its review of distance education in each component (self study and the on-site evaluation) of the accreditation process at those institutions offering education via distance education.

The agency also provides a training manual for conducting on-site reviews to its evaluators. The narrative states that training is also provided to technology centers and evaluation team members; however, no documentation was provided regarding these training activities. Documentation is needed in this area.

Staff determination: The agency does not meet the requirements of this section. The agency needs to provide additional information clarifying the caveat pertaining to programmatic areas that have no national program accreditation or certification. The agency need to provide additional information on its practice of accepting national program certification and/or accreditation in lieu of the on-site program evaluation provided the association's standards are equal to or more comprehensive than the standards established by the State Board. The agency also must provide documentation of its self-study and on-site evaluation training activities for its schools and evaluation teams.

**Analyst Remarks to Response:****National program accreditation:**

The agency states that an evaluation questionnaire (i.e., self-study) is completed by program staff for the various program areas at an institution. It is apparently the agency's policy to allow programs that hold some form of national program certification or accreditation to allow those programs to only fill out portions of the questionnaire, or only provide portions of the required documentation, and substitute the self-study or documentation related to the national program certification/accreditation in lieu of the materials that would normally be required by the state. The agency states that the state requirements and the national requirements have been crosswalked. However, the agency provided no evidence of how the industry or national accrediting agency (such as NLNAC, etc.) standards crosswalk with the state requirements. It is unclear what effect this arrangement has on the members of the on-site review team, which have been trained in the agency's standards and review documents, but presumably have not been trained on either the industry standards nor the national accrediting agency's standards and review process and documents. The agency must demonstrate how it assesses that the industry or national standards comply with the agency requirements and how the agency verifies that the programs continue to meet an industry or national certification or conduct its own program reviews using its own standards, processes, documentation, etc.

**Distance education:**

The agency provided links to two on-site review reports. However, distance education did not appear to be addressed in these documents. The agency stated in a previous response that it will be adding "a few questions" regarding distance education to its review documents, but it does not appear that this has yet happened.

**Training activities:**

The agency provided an agenda outlining training on the agency's review process that was provided by state agency staff for technology center staff. The agenda did not provide sufficient detail to ensure that distance education was covered in the training session.

**Staff determination:** The agency does not meet the requirements of this section. The agency must demonstrate how the industry or national accrediting agency standards it accepts crosswalk with the state requirements and how they are applied/verified in the course of the on-site review. It must also demonstrate that it includes an assessment of distance education in its self-studies, on-site review process, and training.

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**(A) Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.**

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The agency's accreditation handbook specifies that a self-study must be conducted prior to each onsite review as an element of the comprehensive evaluation process. The handbook requires that self-evaluations be conducted by each faculty member, as well as by a group representing the administration and support services areas. While the participation of students, the governing body, or other constituencies in the self-study process is required, there were no apparent requirements regarding the participation of these groups in the handbook. More information is needed on these groups' participation in the self-study process.

The agency has developed questionnaires for various program and administrative/personnel areas that are tied to the state standards and serve as guides for technology centers to use in conducting their self-studies. Two blank sample questionnaires were submitted, but contained no ratings or comments to reflect an actual self-study. It is unclear to ED staff if the questionnaires serve as the actual self-study documents or if the areas included in the questionnaires instead serve as an outline of the areas that should be addressed in a narrative document that is developed by the school. The agency must provide additional information and evidence of how an institution self-assesses its distance education offering against agency standards and quality indicators as appropriate.

Staff determination: The agency does not meet the requirements of this section. The agency must provide more information on the groups that are required to be involved in the self-study process. It must also provide additional information and evidence of how an institution self-assesses its distance education offering against agency standards and quality indicators as appropriate

### **Analyst Remarks to Response:**

Participation in self-analysis:

The agency's on-site review document requires the participation of faculty, staff, and students (including representatives of minorities, nontraditional students, and individuals with disabilities) in the writing and review of the institution's mission and vision statements, goals, and objectives, but does not require their participation in the writing of the self-study, as required in this section.

Distance education:

The agency did not provide additional information and evidence of how an institution self-assesses its distance education offerings against agency standards and quality indicators, as appropriate.

Staff determination: The agency does not meet the requirements of this section. The agency must provide additional information and evidence of how an institution self-assesses its distance education offerings against agency standards and indicators, as appropriate.

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**(B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional content, methods and resources, administrative management, student services, and facilities. It prepares written reports and recommendations for use by the State agency.**

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As noted previously, the agency's handbook requires that on-site evaluation teams consist of state agency staff, teachers, technology center administrators and staff, and business and industry representatives. The agency conducts reviews both in program areas and in administrative areas, using separate teams for the two types of reviews.

The agency provides a copy of its training manual to on-site reviewers for study prior to the on-site review. A sample letter to a reviewer confirming participation in an upcoming on-site review referenced an enclosed training manual. The agency states that it follows up with additional guidance and an orientation session at the beginning of the review, but no documentation was provided to support this.

Sample on-site programmatic and administrative review reports were provided. In the programmatic review, at least one technology center representative was paired with at least one state agency representative in order to review/evaluate each program area at the technology center. For the administrative review, the report was organized by administrative area, but no indication was given as to who reviewed each area. It should be noted that in the case of the sample administrative review, a representative of a regional accrediting agency served as a co-chair of the team, along with the accreditation director for the OBCTE. No information was provided in the agency's narrative regarding the type of participation that is provided by regional accrediting agency representatives in the review process; more information is requested in this area.

The sample on-site review reports that the agency provided covered all of the areas required in this section of the ED regulations. The sample reports contained sections tied to each of the agency's standards and included: an overview; commendations or strengths; specific recommendations for improvement; and general recommendations for improvement. In the samples provided, each of the standards was evaluated as having been met, and no specific recommendations for improvement were provided; however, under each standard, general recommendations for improvement were noted. It is unclear to ED staff why the standards were marked as being met, then followed by recommendations for improvement. It is also unclear whether the general

recommendations carry the full force of findings requiring follow-up action and reports to the agency. More information is needed in this area.

It is further noted that the introduction to the agency's Summary Evaluation Questionnaire states that the document was developed for use in conducting both the self-evaluation and the on-site team review. However, it is unclear how this document is used during the course of the on-site review since it does not appear to be part of the package that is provided to reviewers prior to the on-site visit. More information is needed on the use of the questionnaires during the on-site review process.

Staff determination: The agency does not meet the requirements of this section. The agency needs to provide more information on the content of the orientation sessions. It must provide more information on the participation and role of regional accrediting agency representatives (and any others not listed as review participants in its accreditation manual) in the review process. It must provide more information on the significance of the general recommendations for improvement in the review process. More information and documented evidence of the agency's use of questionnaires and particularly the quality indicators during the course of the on-site review process is necessary.

#### **Analyst Remarks to Response:**

Reviewer orientation:  
Not addressed.

Regional agency participation:  
The agency coordinates site visits with NCA-CASI and the teams share information on their findings. The agency states that the two teams write separate on-site review reports.

Recommendations vs. suggestions:  
The agency clarified that the specific recommendations included in its on-site evaluations are, in fact requirements. It also states that general suggestions are suggestions, but not requirements. However, the agency also states that "crucial" suggestions must be addressed by the time of the next review. This is confusing, as it appears that general suggestions are indeed suggestions, but crucial suggestions take the form of deferred recommendations (i.e., requirements). It is unclear how an institution knows which suggestions are truly suggestions, and which are deferred requirements. It is also unclear why suggestions that are serious enough that they must be addressed within five years do not rise to the level of recommendations (requirements). This approach raises questions as to the consistency of the decision-making process.

Questionnaires:  
ED staff noted during its on-site visit observation that the agency's questionnaires are used as evaluation instruments by team members. Various questionnaires, which are subject area specific, have been developed by the state agency and are completed by team members during the course of their

interviews with school staff, as well as during their documentation review/verification process.

Staff determination: The agency does not meet the requirements of this section. The agency needs to provide information on the content of the orientation sessions. It must provide further information and justification that the use of "crucial" suggestions in the review process is clearly identified and the agency application and decision-making in this context are applied consistently.

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**(i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students, and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy, and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system;**

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The agency provided a list of advisory council members. The agency noted that student participation was planned for the near future.

No charter or similar documentation was provided to demonstrate the advisory council's functions. More information is needed in this area.

Staff determination: The agency does not meet the requirements of this section. The agency needs to document student participation on its advisory council. The agency also needs to provide documentation to demonstrate the advisory council's assigned functions.

#### **Analyst Remarks to Response:**

Student participation:

Documentation of student participation in advisory council meetings was not provided.

Advisory council functions:

The agency states that its advisory council does not have a charter. No other documentation was provided to delineate the council's assigned functions.

Staff determination: The agency does not meet the requirements of this section. The agency needs to document student participation on its advisory council. The agency also needs to provide documentation to demonstrate the advisory council's assigned functions.

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**(vii) Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the students;**

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The agency submitted meeting minutes that document that its advisory council is actively involved in the review of the agency's procedures. However, no information was provided as to indicate that the advisory council is actively engaged in any review of the agency's standards, how often the standards are reviewed, or who is involved in the review process. More information is needed in this area.

Staff determination: The agency does not meet the requirements of this section. The agency needs to provide more information and documentation regarding its standards review process.

**Analyst Remarks to Response:**

The agency's response to the draft analysis referred staff to Exhibit 32 in its original documentation. However, this documentation was related to ongoing discussions of the agency's review process, not its standards. One page included the following goal: "To submit recommendations to the Accreditation and Evaluation Process Team regarding the consistency of evaluation standards." Under this goal were recommendations to "work on a standard each week for two hours to reach consensus of the quality indicators" and "complete all standards by December 15, 2010." While this would indicate that the agency did recommend a standards review, no documentation was provided to show that the recommendations were followed, that the review took place, who was involved in the review, etc.

Staff determination: The agency does not meet the requirements of this section. The agency must provide information regarding its standards review process.

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**(xi) Requires each approved school or program to report on changes instituted to determine continue compliance with standards or regulations;**

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The agency's accreditation manual states that, within the five year comprehensive review period, continuing accreditation is extended on a yearly basis and may be withdrawn at the conclusion of the fiscal year. The narrative states that the board should be notified of any changes that have been made. However, it is unclear if the agency requires a formal annual report to collect information on any changes that may have occurred. It is expected that the agency will make the assessment that changes have been made that could jeopardize the institution's accreditation status, and not the institution. More

information is needed on how the agency can effectively monitor changes that may occur throughout the accreditation period.

Staff determination: The agency does not meet the requirements of this section. The agency must provide more information on how the agency can effectively monitor changes that may occur throughout the accreditation period

**Analyst Remarks to Response:**

The agency states that schools are required to submit enrollment data and follow-up reports annually. However, the agency did not submit any documentation to substantiate that it is collecting this required information.

Staff determination: The agency does not meet the requirements of this section. The agency must provide documentation of how it monitors changes that may occur during an institution's accreditation period.

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**(1) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services;**

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The agency has apparently interpreted this criterion as relating primarily to equal access in admissions. While the agency has provided ample evidence of its requirements related to equal opportunity, it has not addressed the requirements of this criterion. The agency must provide information regarding its standards' requirements related to ethical recruitment practices, ethical (i.e., truthful) advertising, the right to easily obtainable and accurate transcripts, equitable student refund policies, and the provision of student placement services.

Staff determination: The agency does not meet the requirements of this section. The agency must address how its standards require ethical institutional practices related to recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services.

**Analyst Remarks to Response:**

Recruitment and advertising:

The agency's Standard J requires that recruitment and admission policies shall be non-discriminatory. Its standard M requires that printed materials and other media be presented in an accurate and ethical manner. The agency's evaluation questionnaire requires that an institution have a marketing plan that is evaluated annually and include individuals with disabilities, non-traditional students, and minorities.

Transcripts and placement:

The agency states that its institutions do not provide transcripts. However, it



states that schools do provide completion evidence. The agency's standard C.11 requires that enrollment, placement, continuing education, and follow-up records be maintained for each program. The agency's evaluation questionnaire requires that students be assisted with managing the process for transitioning to collegiate studies or other advanced credentials related to their career goals.

**Refunds:**

The agency's evaluation questionnaire requires that an institution have developed a fair and equitable refund policy that adheres to federal student aid requirements. However, it is not clear where requirements related to refunds/student aid are addressed in the agency's standards.

**Staff determination:** The agency does not meet the requirements of this section. The agency must address how its standards (as opposed to its evaluation instrument) require ethical institutional practices related to fair and equitable student tuition refunds (i.e., financial aid practices).

### **PART III: THIRD PARTY COMMENTS**

The Department did not receive any written third-party comments regarding this agency.